UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

Ref: 8HWM-ER

SEP 19 1995

Randy Matsushima
Colorado Refining Company
5800 Brighton Boulevard
Commerce City, CO 80022

Re: Spill Prevention Control and Countermeasure Plan
SPCC #C94028

Dear Mr. Matsushima:

The Spill Prevention Control and Countermeasure (SPCC) Plan submitted by you for the Colorado Refining Company has been reviewed by this office and found to address the major topics required in 40 CFR, Part 112, including management approval and certification by a registered Professional Engineer (PE). This PE certification indicates to this office the plan was prepared using good engineering practices and meets the requirements of 40 CFR, Part 112.

This letter acknowledges receipt of the requested information submitted by you and serves as notification that the above referenced action is closed, due to full compliance with those actions listed in the letter of deficiency. The U.S. Environmental Protection Agency (EPA) expects continued compliance with the requirements under 40 CFR Part 112.

Please note that records and inspections are to be maintained at least three years as required by 40 CFR 112.7(e)(8). This was not mentioned in your Plan. Also, please be aware that section 112.5 (b) of CFR 40 requires that the SPCC Plan be evaluated and reviewed every three years. Should any physical changes be made in the facility, the SPCC Plan must be amended and certified by a registered Professional Engineer. It is not necessary to submit amended Plans to this office, unless requested to do so.

EPA makes no assurance that, if the plan is implemented, discharges of oil will be prevented. Further this notification is not an election by EPA to forego any civil action under the SPCC provisions of the Clean Water Act in the event of a spill.

The Clean Water Act, Section (b) (5) requires that oil spills be reported to the Federal Government. This may be done by contacting the National Response Center at (800)424-8802.

If you have any questions, please contact Martha Wolf at (303) 294-7164 or me at (303) 293-0093. Thank you for your cooperation.

Sincerely,

(b) (6) [redacted]

Kate Fry
Prevention Section
Emergency Response Branch

cc: Martha Wolf

Printed on Recycled Paper

SPCC Plan Review Form (9/90)

Facility Name: COLORADO REFINING COMPANY C94028

Reviewed by: KATE FRY Date of Review: 9/18/95

Indicate whether item is adequately addressed (+), inadequately addressed (-), not addressed (0) or is not applicable (NA).

+ PE Certification [112.3(d)]

+ Management Approval [112.7]

+ Spill History [112.7(a)]

+ Spill Prediction [112.7(b)]

___ Secondary Containment [112.7(c)]

___ Contingency Plan [112.7(d)]

Facility Drainage [112.7(e)(1)(i-v)]

+ Drainage retained by valves (i)
NA Valves are manual; open and close - not flapper type (ii)
+ Drainage from undiked areas flows into catchment basins. (iii)
+ Return system, if necessary (iv)
___ Lift stations used as necessary (v)

Bulk Storage Tanks [112.7(e)(2)(i-xi)]

+ Tanks are compatible with material stored (i)
+ Secondary containment holds largest tank + 10% (ii)
NA Rainwater empties into waterway (iii)
+ Buried tanks protected against corrosion (iv) double walled
+ Use of partially buried tanks (v)
+ Regular testing of aboveground tanks (vi)
+ Use of internal coils (vii)
+ Tanks are kept up-to-date: (viii)
___ High level alarms (A)
___ High level pump cut-off (B)
+ Audible or code warning (C)
___ Level sensing devices tested regularly (D)
+ Direct readout of devices (E)

+ Site disposal facilities inspected regularly (NPDES) (ix)
+ Correction of observed oil leaks (x) see letter
+ Portable storage tanks properly positioned (xi)

Facility Transfer Operations [112.7(e)(3)(i-v)]

+ Buried piping protectively wrapped, cathodically protected (i)
+ Out of service pipes are capped (ii)
+ Pipe supports used where necessary (iii)
+ Inspection of aboveground pipes (iv)
+ Warning signs for trucks (clearance, etc.) (v)

Facility Loading/Unloading Operations [112.7(e)(4)(i-iv)]

+ Follows DOT procedures (i)
+ System holds maximum capacity of largest compartment in truck (ii) quick drain system
+ Vehicles are examined before leaving facility (iii)
+ Bottom drain of vehicle examined before leaving (iv)

Oil Production Facilities [112.7(e)(5)(ii-iv)]

___ Tank batteries containment area drain valves are closed, rainwater is inspected prior to discharge (ii)(A)
___ Field drainage ditches and dikes inspected (ii)(B)
___ Tanks are compatible with material stored (iii)(A)
___ Secondary containment used as feasible (iii)(B)
___ Visual inspection of tanks containing oil (iii)(C)
___ New and old tank batteries kept up to date (iii)(D)
___ Valves and pipelines inspected regularly (iv)(A)
___ Salt water disposal facilities inspected regularly (iv)(B)
___ Flowline maintenance to prevent spills (iv)(C)

Oil Drilling and Workover Facilities [112.7(e)(6)(i-iii)]

___ Proper positioning of drilling equipment (i)
___ Catchment basins or diversion structures

used as needed (ii)
___ Blow-out prevention and well control (iii)

Oil Drilling, Production and Workover Facilities [112.7(e)(7)(ii-xvii)]

___ Oil drainage collection (ii)
___ Adequate sumps and drains (iii)
___ Separators equipped with high level alarm (iv)
___ Surge tanks " " " " " (v)
___ Pressure tanks equipped with high and low level alarms (vi)
___ Corrosion protection for tanks (vii)
___ Written procedure pollution control systems (viii)
___ Equipment testing conducted (ix)
___ Description of well valve controls (x)
___ BOP assembly and well control system (xi)
___ Well control measures for emergency situations (xii)
___ Written instructions for contractors/subcontractors (xiii)
___ Manifolds equipped with check valves (xiv)
___ Pressure sensing devices for necessary flowlines (xv)
___ Pipelines protected from corrosion (xvi)
___ Sub-marine pipelines inspected regularly (xvii)

Inspection and Records [112.7(e)(8)]

___ Should be kept for three years

Security [112.7(e)(9)(i-v)]

+ Fencing (i)
+ Master flow/drain valves locked in closed position (ii)
+ Starter control locked in off position (iii)
+ Pipelines not in use drained and blank-flanged (iv)
+ Facility well-lit (v)

Personnel Training [112.3(e)(10)(i-iii)]

+ Personnel properly instructed (i)
+ One person designated for spill prevention (ii)
+ Owner schedules training (iii)

Additional Comments:
(Discuss facility appearance, general comments and inspection findings.)

List of attachments

(b) (6) [redacted]

Signature of Inspector

9/18/98
Date

FOR DRAFT

SPCC Plan Review Form (9/90)

Facility Name: Colorado Refining Company C9402B

Reviewed by: KATE FRY Date of Review:

Indicate whether item is adequately addressed (+), inadequately addressed (-), not addressed (0) or is not applicable (NA).

— PE Certification [112.3(d)] to be completed

— Management Approval [112.7] to be completed

+ Spill History [112.7(a)]

+ Spill Prediction [112.7(b)]

+ Secondary Containment [112.7(c)]

___ Contingency Plan [112.7(d)]

Facility Drainage [112.7(e)(1)(i-v)]

___ Drainage retained by valves (i) no valves
+ Valves are manual; open and close - not flapper type (ii)
+ Drainage from undiked areas flows into catchment basins. (iii)
+ Return system, if necessary (iv)
NA Lift stations used as necessary (v)

Bulk Storage Tanks [112.7(e)(2)(i-xi)]

+ Tanks are compatible with material stored (i)
+ Secondary containment holds largest tank + 10% (ii) 6-inches of rain
3A + Rainwater empties into waterway (iii) to water treatment
___ Buried tanks protected against corrosion (iv)
___ Use of partially buried tanks (v) probably NA
+ Regular testing of aboveground tanks (vi)
NA Use of internal coils (vii)
+ Tanks are kept up-to-date: (viii)
___ High level alarms (A)
+ Audible or code warning (C)
+ Level sensing devices tested regularly (D)
+ Direct readout of devices (E)

No mention of UST 1

+ Site disposal facilities inspected regularly (NPDES)(ix)
0 Correction of observed oil leaks (x)
0 Portable storage tanks properly positioned (xi)

Facility Transfer Operations [112.7(e)(3)(i-v)]

+ Buried piping protectively wrapped, cathodically protected (i) old lines replaced & tested.
+ Out of service pipes are capped (ii)
+ Pipe supports used where necessary (iii)
+ Inspection of aboveground pipes (iv)
+ Warning signs for trucks (clearance, etc.) (v)

Facility Loading/Unloading Operations [112.7(e)(4)(i-iv)]

+ Follows DOT procedures (i)
+ System holds maximum capacity of largest compartment in truck (ii)
+ Vehicles are examined before leaving facility (iii)
+ Bottom drain of vehicle examined before leaving (iv)

Oil Production Facilities [112.7(e)(5)(ii-iv)]

___ Tank batteries containment area drain valves are closed, rainwater is inspected prior to discharge (ii)(A)
___ Field drainage ditches and dikes inspected (ii)(B)
___ Tanks are compatible with material stored (iii)(A)
___ Secondary containment used as feasible (iii)(B)
___ Visual inspection of tanks containing oil (iii)(C)
___ New and old tank batteries kept up to date (iii)(D)
___ Valves and pipelines inspected regularly (iv)(A)
___ Salt water disposal facilities inspected regularly (iv)(B)
___ Flowline maintenance to prevent spills (iv)(C)

Oil Drilling and Workover Facilities [112.7(e)(6)(i-iii)]

___ Proper positioning of drilling equipment (i)
___ Catchment basins or diversion structures

used as needed (ii)
___ Blow-out prevention and well control (iii)

Oil Drilling, Production and Workover Facilities [112.7(e)(7)(ii-xvii)]

___ Oil drainage collection (ii)
___ Adequate sumps and drains (iii)
___ Separators equipped with high level alarm (iv)
___ Surge tanks " " " " " (v)
___ Pressure tanks equipped with high and low level alarms (vi)
___ Corrosion protection for tanks (vii)
___ Written procedure pollution control systems (viii)
___ Equipment testing conducted (ix)
___ Description of well valve controls (x)
___ BOP assembly and well control system (xi)
___ Well control measures for emergency situations (xii)
___ Written instructions for contractors/subcontractors (xiii)
___ Manifolds equipped with check valves (xiv)
___ Pressure sensing devices for necessary flowlines (xv)
___ Pipelines protected from corrosion (xvi)
___ Sub-marine pipelines inspected regularly (xvii)

Inspection and Records [112.7(e)(8)]

+ Should be kept for three years ~~not~~ three years not indicated

Security [112.7(e)(9)(i-v)]

+ Fencing (i)
+ Master flow/drain valves locked in closed position (ii)
+ Starter control locked in off position (iii)
___ Pipelines not in use drained and blank-flanged (iv) C2
+ Facility well-lit (v)

Personnel Training [112.3(e)(10)(i-iii)]

+ Personnel properly instructed (i)
+ One person designated for spill prevention (ii)
___ Owner schedules training (iii)

Additional Comments:
(Discuss facility appearance, general comments and inspection findings.)

List of attachments

Signature of Inspector _____ Date _____

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

Ref: 8HWM-ER

Randy Matsushima
Colorado Refining Company
5800 Brighton Boulevard
Commerce, CO 80022

AUG 2 1995

RE: SPCC #C94028

Dear Mr. Matsushima:

On July 24, 1995, we issued a Letter of Violation for the above referenced facility. The July 24, 1995 letter was issued in response to an inspection to determine the facility's compliance status with the requirements of the Oil Pollution Prevention Regulations at Title 40 of the Code of Federal Regulations 40 CFR Part 112, promulgated pursuant to Section 311 (j) of the Clean Water Act (the Act), 33 U.S.C. Section 1321(j). Within this letter, we required you to return a signed Statement of Correction and a copy of the facility's certified Spill Prevention, Control and Countermeasures (SPCC) Plan within thirty (30) days. **Please be advised that the specified deadline should have been sixty (60) days after receipt of the July 24, 1995 Letter of Violation.**

In the event compliance cannot be achieved within the 60 day period, you are required to report the reasons thereof and submit a schedule by which the facility will achieve full compliance with the regulations. Please be advised that by issuance of this letter, EPA has not waived its right to take any civil action authorized under the Clean Water Act in the event of an oil spill.

We apologize for any inconvenience this may have caused. If you have any questions please contact Martha Wolf at (303) 294-7164 or myself at (303) 293-0993.

Sincerely,

(b) (6) [redacted]

Kate Fry
Prevention Section
Emergency Response Branch

cc: Martha Wolf

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2466

JUL 24 1995

Ref: 8HWM-ER

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Randy Matsushima
Colorado Refining Company
5800 Brighton Blvd.
Commerce City, CO 80022

RE: LETTER OF VIOLATION Issued Pursuant to Oil Pollution Prevention Regulations Promulgated Spill Prevention, Control and Countermeasure (SPCC) Number: C94028

Dear Mr. Matsushima:

On December 2, 1993, a representative of the U.S. Environmental Protection Agency (EPA) inspected Colorado Refining Company. The purpose of this inspection was to determine the facility's compliance status with the requirements of the Oil Pollution Prevention Regulations at Title 40 of the Code of Federal Regulations 40 CFR Part 112, promulgated pursuant to Section 311(j) of the Clean Water Act (the Act), 33 U.S.C. Section 1321(j). The inspection revealed the following violations:

Technical Violations (40 CFR 112.7):

Measures:

Correction of observed oil leaks, (pooled oil observed at sample port operation) [112.7(e)(2)(x);

Facility transfer operations - buried pipelines corrosion protected [112.7(e)(3)(i)];

Facility transfer operations - inspection of aboveground pipes, (leaking pipes, valves, and circulating pumps observed next to Tank #43; leaking piping and valves observed next to Tank #32) [112.7(e)(3)(iv)];

Secondary containment for railcars [112.7(e)(4)(ii)];

Warning system in loading/unloading area(s) to prevent premature departure of vehicles [112.7(e)(4)(iii)];

Security - flow valves locked [112.7(e)(9)(ii)].

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SPCC Plan Deficiencies

Spill prediction is inadequately addressed, (spill rate and flow direction) [112.7(b)];

Drainage of diked areas is inadequately addressed, (no discussion of how diked areas are pumped to water treatment) [112.7(e)(1)(i)];

Facility drainage - undiked areas is inadequately addressed, (retention ponds located south of south tank farm) [112.7(e)(1)(iii)];

Bulk storage tanks is not addressed, (fail-safe engineering, correction of observed oil leaks, or mobile tanks) [112.7(e)(2)(viii,x,xi)];

Bulk storage tanks - integrity testing, (impermeability of dikes areas; tank integrity and inspection) [112.7(e)(2)(ii,vi)];

Facility transfer operations - cathodic protection for buried piping is inadequately addressed [112.7(e)(3)(i)];

Loading/unloading operations - containment for railcars is not addressed [112.7(e)(4)(ii)];

Warning/barrier system for trucks/railcars is not addressed [112.7(e)(4)(iii)];

Inspections and records is inadequately addressed, (tank and above ground piping inspection; employee training; API procedures) [112.7(e)(8)];

Security is inadequately addressed, (Water draw-off valves; lighting) [112.7(e)(9)(ii,v)];

Personnel training is inadequately addressed, (spill prevention briefings; training records) [112.7(e)(10)(iii)];

You are hereby required to sign the enclosed Statement of Correction and submit it and a copy of the facility's certified plan within thirty (30) days after receipt of this letter to:

Martha Wolf (8HWM-ER)
U.S. Environmental Protection Agency
999 18th Street, Suite 500
Denver, Colorado 80202-2405

In the event compliance cannot be achieved within the 30 day period, you are required to report the reasons thereof and submit a schedule by which the facility will achieve full compliance with

the regulations. If not complied with, the Regulations provide that "owners or operators of such facilities shall be liable for a civil penalty of not more than $25,000 for each day such violation continues." Please be advised that by issuance of this letter, EPA has not waived its right to take further enforcement action against the facility, including the assessment of penalties pursuant to 40 CFR Part 114, promulgated under Section 311(j), for the violations noted above.

If you have any questions regarding this Letter of Deficiency, please contact Martha Wolf at (303) 294-7164 or Bob Turley at (303) 294-7100. When communicating with this office either by telephone or letter, you must **always** refer to the **SPCC Number** exactly as it appears above.

Sincerely,

(b) (6) [redacted]

Martha Wolf
Prevention Section
Emergency Response Branch

Enclosure

Case Number: C94028

STATEMENT OF CORRECTION

I hereby certify under penalty of perjury (18 U.S.C. 1081) that all violations listed in the Letter of Deficiency dated have been corrected and that is now in compliance with all requirements of 40 CFR Part 112.

_____

Owner's/Operator's Name

_____

Owner's/Operator's Signature Date

_____

Facility

Sworn to and before me this
_____ day of_____, 199__

_____

NOTARY PUBLIC

P 293 315 125

Receipt for Certified Mail
No Insurance Coverage Provided

C94028
Randy Matsushima
Colorado Refining Compan
5800 Brighton Boulevard
Commerce, CO 80022

PS Form **3800**, June 1991

Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	JUL 24 1995

Is your RETURN ADDRESS completed on the reverse side?

SENDER:
- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date

JUL 25 1995

C94028
Randy Matsushima
Colorado Refining Company
5800 Brighton Boulevard
Commerce, CO 80022

I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery
Consult postmaster for fee.

4a. Article Number P 293 315 125

4b. Service Type
☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery 7/26/95

5. Signature (Addressee)
(b) (6)

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.

PS Form **3811**, December 1991 *U.S. GPO: 1993—352-714 **DOMESTIC RETURN RECEIPT**

Spill Prevention Control
and Countermeasures Inspection

COLORADO REFINING COMPANY
Commerce City, Colorado

December 2, 1993

TDD# Z2-9401-22
SPCC Inspections
Colorado

Submitted to:
Martha Wolf
U.S. EPA Region VIII

Prepared by:
Bob Litchford
Steve Halstead

RESOURCE APPLICATIONS, INC.
141 Union Blvd., Suite 290
Lakewood, CO 80228
(303) 969-9300 Telephone
(303) 969-0669 Facsimile

U.S. EPA 8(a) Technical Assistance Team - Zone II

Table of Contents

COLORADO REFINING COMPANY
Commerce City, Colorado

LIST OF APPENDICES

1.0 GENERAL INFORMATION

Send correspondence to:
(check where applicable)

☒	Facility Name:	Colorado Refining Company 5800 Brighton Blvd. Commerce City, Colorado 80022 (303) 295-4500
☐	Facility Contact:	Randy Matsushima Environmental Engineer
☐	Owner/Operator:	Colorado Refining Company 999 18th Street Denver, CO 80202-2523 (303) 291-2000
☐	Other	

SPCC Inspection Date: December 2, 1993

Inspector: (b) (6) [redacted]
Bob Litchford

2.0 SPCC APPLICABILITY

The facility stores in excess of one million gallons of petroleum products and is located adjacent to Sand Creek. The regulations of 40 CFR Part 112 apply to the facility.

3.0 COMPLIANCE STATUS SUMMARY

Facility in Compliance: ☒ No ☐ Yes

After review, the **SPCC Plan** was found to be deficient in the following areas:

- Spill prediction [112.7(b)]: Inadequately addressed. Lacks spill rate, and direction of flow.

- Drainage of diked areas [112.7(e)(1)(i)]: Inadequately addressed. The Plan states that diked areas are pumped to water treatment. How this is done is not addressed.

- Facility drainage - undiked areas [112.7(e)(1)(iii)]: Inadequately addressed. There is no discussion regarding the stormwater retention ponds located south of the south tank farm. The ponds are not indicated on the facility diagram.

- Bulk storage tanks [112.7(e)(2)(viii,x,xi)]: Not addressed. The Plan does not address fail-safe engineering features, correction of observed oil leaks, or mobile tanks.

- Bulk storage tanks - integrity testing [112.7(e)(2)(ii,vi)]: Inadequately addressed. The Plan does not address impermeability of dikes areas. The Plan does not indicate how tanks are tested, or how often they are tested. Also, inspection of tank supports and foundations is not addressed.

- Facility transfer operations - cathodic protection for buried piping [112.7(e)(3)(i)]: Inadequately addressed. There is no statement indicating why cathodic protection is not applicable.

- Loading/unloading operations - containment for railcars [112.7(e)(4)(ii)]: The railcar loading/unloading area containment system is not addressed.

- Warning/barrier system for trucks/railcars [112.7(e)(4)(iii)]: Warning system for railcars is not addressed. The truck loading system is inadequately addressed. Plan should explain how the transfer would be stopped if a truck departed prematurely.

- Inspections and records [112.7(e)(8)]: Inadequately addressed. Written procedures of required inspections of tanks and aboveground piping are not addressed. Employee training records are not addressed. API procedures are referenced, which API procedures are followed is not indicated.

- Security [112.7(e)(9)(ii,v)]: Inadequately addressed. Water draw-off valves kept locked is inadequately addressed. Plan states they are not locked, but are operated only by authorized personnel. Lighting adequate to detect/prevent spills at night is inadequately addressed.

- Personnel training [112.7(e)(10)(iii)]: Inadequately addressed. The owner/operator does not schedule spill prevention briefings for personnel. Also, only potential hazards are discussed according to the Plan, and training records are not addressed.

After inspection, the **SPCC Measures** were determined to be deficient in the following areas:

- Facility transfer operations - buried pipelines corrosion protected [112.7(e)(3)(i)]: The buried piping at the facility has no corrosion protection.

- Facility transfer operations - inspection of aboveground pipes [112.7(e)(3)(iv)]: There are some leaking pipes, valves, and circulating pumps next to Tank #43, and leaking piping and valves next to Tank #32.

- Secondary containment for railcars [112.7(e)(4)(ii)]: There is no secondary containment or other provision for handling spills in the railcar loading area.

- Warning system in loading/unloading areas [112.7(e)(4)(iii)]: There is no system to prevent or warn against premature departure of tank trucks in the two truck rack loading/unloading areas.

- Security - flow valves locked [112.7(e)(9)(ii)]: Water draw-off valves on storage tanks are not kept locked.

Comments:

The facility generally appears well-maintained, but several areas within the tank farms show evidence of minor equipment leakage and oil-stained soil, indicating a need for more thorough maintenance (e.g. pump stations for product/crude oil transfer). The railcar loading rack area lacks any containment or quick-drain sump system to handle a spill in this area. The tank truck loading/unloading areas lack signs warning against premature departure.

- Correction of observed oil leaks [112.7(e)(2)(x)] - sample port operation - See photos.

Appendix A

SPCC FACILITY INSPECTION FORM

SPCC FACILITY INSPECTION FORM

Case # C94028 Inspection Date December 2, 1993

Inspector(s) R. Litchford

R. Munn

Send correspondence to :
(check where applicable)

☐ Facility Name, Location, and Phone: Colorado Refining Company (303) 295-4500
5800 Brighton Blvd., Commerce City, CO 80022

☐ Facility Operator, Address, and Telephone: Same as above

☐ Facility Owner, Address, and Telephone: Colorado Refining Company
999 18th St., Denver, CO 80202-2523

☐ Other: Colorado Refining Co. is a wholly-owner subsidiary of:
Total Petroleum, Inc., 999 18th St., Denver, CO 80202-2523
(303) 291-2000

Individual(s) Contacted: Randy Matsushima Is facility subject to 40 CFR 112? Yes

Title: Environmental Manager Does the facility have an SPCC Plan? Yes

Can a release impact a waterway? Yes Name of Waterway Sand Creek, a tributary of the South Platte River

Distance and direction to nearest Waterway Approx. 100' North of the north facility boundary

# Storage Tanks	Capacity	Material Stored
SEE FACILITY TANK	LIST, APPENDIX	

Total Storage Capacity: 1,176,314 barrels (49,405,188 gallons)

Is the plan certified by a Professional Engineer? Yes. March 30, 1993

Name of P.E.: Michael R. Dusenbury

Registration #: 15630 – Colorado

Facility History - have there been spills or prior inspections? A multi-media inspection by EPA and the State of Colorado was conducted less than 2 years ago. Inspection did not include an SPCC Inspection.

Inspection Purpose (what initiated the inspection): EPA Request

Secondary Containment

Containment volume [112.7(c) or 112.7(e)(2)(ii)]: Adequate for all tanks.

Does a contingency plan exist: No.

Facility Drainage

Drainage retained by valves [112.7(e)(1)(i)]. N/A. Accumulated rainwater is removed at low point in diked area & run through facility water treatment plant.

Valves are manual open and close - not flapper type [112.7(e)(1)(ii)]. N/A

Drainage from undiked areas flows into catchment basins [112.7(e)(1)(iii)]. N/A

Return system, if necessary [112.7(e)(1)(iv)]. N/A

Lift stations used as necessary [112.7(e)(1)(v)]. In-plant drainage goes to an API separator, and water is pumped to the treatment system. Lift stations with back-up pumps are employed.

Storage Tanks

Compatible construction [112.7(e)(2)(i)]:

Yes

Dike area drainage retained by valves - water inspected before drainage [112.7(e)(2)(ii)-(iii)]:

N/A

Corrosion protection for buried tanks [112.7(e)(2)(iv)]:

The facility has no buried tanks.

Partially buried tanks present (should be corrosion protected) [112.7(e)(2)(v)]:

No partially-buried tanks

Tanks tested for structural integrity [112.7(e)(2)(vi)]:

Periodic in-house testing following API procedures.

Fail-safe engineering for tanks (should have direct readout gauges at a minimum [112.7(e)(2)(viii)]:

Direct readout gauges

Facility NPDES permit:

Yes. Discharge is to Sand Creek at north facility boundary.

Facility Transfer Operations

Buried piping corrosion protected [112.7(e)(3)(i)]:

Old lines are not protected, but ~~are~~ when replaced new lines are corrosion protected.

Out-of-service pipes capped/blank flanged [112.7(e)(3)(ii)]:

Yes.

Pipe supports used (indicate if needed) [112.7(e)(3)(iii)]:

Yes

Inspection procedures for valves and pipes [112.7(e)(3)(iv)]:

Visually checked daily, and periodically by refinery inspection team.

Are warning signs for vehicular traffic present [112.7(e)(3)(v)]:

Signs and other measures

Facility Loading/Unloading Operations

Loading/unloading procedures meet DOT regulations [112.7(e)(4)(i)]:

Yes

Secondary containment for vehicles adequate [112.7(e)(4)(ii)]:

Railcar loading area is without containment

Warning/barrier system for vehicles [112.7(e)(4)(iii)]:

Yes

Vehicles examined before leaving [112.7(e)(4)(iv)]:

Yes

Inspections/recordkeeping

Facility inspection procedures:

ADI procedures are followed

Length of time records kept (must be three years) [112.7(e)(8)]:

3 years or longer

Site Security

Fencing [112.7(e)(9)(i)]:

Facility is fully fenced

Flow valves locked [112.7(e)(9)(ii)]:

All valves on active tanks are in operating or stand-by status.

Starter controls locked [112.7(e)(9)(iii)]:

Starter controls are inaccessible to unauthorized personnel

Lights [112.7(e)(9)(v)]:

Facility lighting is adequate in all areas.

List Spill Control Equipment at Facility:

Appendix B

PHOTOGRAPHS

SPCC PLAN REVIEW
NON-PRODUCTION FACILITIES

Case # C94028 **Reviewed By** Steve Halstead

Facility Name Colorado Refining Co. **Date** 3-17-94

☐ Available and adequate

Available but inadequate due to:

A. ☐ Not fully implemented [112.3 (b)].
B. ☐ Not certified [112.3(d)].
C. ☐ Not maintained at facility/field office [112.3(e)].
D. ☐ No report to RA for spill [112.4(a)].
E. ☐ No amendment for facility modification [112.5(a)].
F. ☐ No review/evaluation every 3 years [112.5(b)].
G. ☐ No certification of amendment [112.5(c)].
H. ☐ No management approval [112.7].
I. ☐ Not a well thought-out Plan [112.7].
J. ☐ Non-conformance to SPCC guidelines listed below [112.7].

Indicate if the following items are adequately addressed (+), inadequately addressed (-), not addressed (0), or not applicable (NA).

7(a) ± Spill History [112.7(a)]. Only 73-74 is addressed, as per regulation.
7(b) — Spill Prediction [112.7(b)]. No rate, direction of flow
7(c) + Secondary containment systems [112.7(c)], (or)
7(d) NA Statement/demonstration of impracticality [112.7(d)], (and)
7(d)(1,2) NA Strong oil spill contingency plan and written commitment of manpower-equipment [112.7(d)(1)(2)].

Facility Drainage [112.7(e)(1)(i-v)]

1(i) — Drainage retained by valves (i). Removable gates
1(ii) + Valves are manual open and close - not flapper type (ii).
1(iii) — Drainage from undiked areas flows into catchment basins (iii). - catchment ponds not addressed
1(iv) + Return system, if necessary (iv).
1(v) + Lift stations used as necessary (v).

Bulk Storage Tanks [112.7(e)(2)(i-x)]

2(i) + Tanks are compatible with material stored (i).
2(ii) — Secondary containment holds largest tank +10% (ii). - Dikes impervious not addressed
2(iii) NA Rainwater inspected before drainage (iii).
2(iv) NA Buried tanks protected against corrosion (iv).

Bulk Storage Tanks [112.7(e)(2)(i-x)] (continued)

2(v)	NA	Use of partially buried tanks (v).
2(vi)	—	Regular testing of above-ground tanks (vi). No indication how-when tanks are tested
2(vii)	NA	Use of internal coils (vii).
2(viii)	O	Tanks are kept up-to-date (viii):
2(viii)(A)	O	High level alarms (A).
2(viii)(B)	O	High level pump cut-off (B).
2(viii)(C)	+	Audible or code warning (C).
2(viii)(D)	O	Level sensing devices tested regularly (D).
2(viii)(E)	O	Direct readout devices (E).
2(ix)	+	Site disposal facilities inspected regularly (NPDES) (ix).
2(x)	O	Correction of observed oil leaks (x).
2(xi)	O	Portable storage tanks properly positioned (xi).

Facility Transfer Operations [112.7(e)(3)(i-v)]

3(i)	—	Buried piping protectively wrapped, cathodically protected (i). No reason for no cathodic protection
3(ii)	+	Out-of-service pipes are capped (ii).
3(iii)	+	Pipe supports used where necessary (iii).
3(iv)	+	Inspection of above-ground pipes (iv).
3(v)	+	Warning signs for trucks (clearance, etc.) (v).

Facility Loading/Unloading Operations [112.7(e)(4)(i-iv)]

4(i)	+	Follow DOT procedures (i).
4(ii)	—	System holds maximum capacity of largest compartment in truck (ii). Railcars not addressed
4(iii)	—	Warning/barrier system for vehicles (iii). Railcars not addressed states no system for trucks
4(iv)	+	Bottom drain of vehicle examined before leaving (iv).

Inspection and Records [112.7(e)(8)]

8	—	Inspections/records in accordance with written procedures, kept three years, included in Plan. Written procedures of required inspections not addressed. Records of employee training are not addressed.

Security [112.7(e)(9)(i-v)]

9(i)	+	Fencing (i).
9(ii)	—	Master flow/drain valves locked i closed position (ii). states water draw-off values are not kept locked
9(iii)	+	Starter control locked in off position (iii).
9(iv)	+	Pipelines not in use drained and blank-flanged (iv).
9(v)	—	Facility well-lit (v). Says adequate

Personnel Training [112.7(e)(10)(i-iii)]

10(i)	+	Personnel properly instructed (i).
10(ii)	+	One person designated for spill prevention (ii).
10(iii)	—	Owner schedules training (iii). No scheduled spill briefings

RECORD OF SPCC PLAN REVIEW

ON-SHORE FACILITIES

(excluding drilling, production and workover facilities)

Owner or Operator: Colorado Refining Co. Facility Name: Colorado Refining Co.

Date Facility Commenced Operations: 1930's Date of SPCC Plan: March 30, 1993

Date Last Reviewed/Amended: March 30, 1993 Plan kept at facility/nearest field office? Yes

Date of this review: December 2, 1993 Reviewer: _____

The facility is required to address each of the general and specific requirements of the Regulation (40 CFR Part 112) in the SPCC Plan, if applicable. Record conformance with this requirement as Adequate (A), Inadequate (I), Applicable, but Omitted (O), or Not Applicable to this facility (NA). (+) (−)

IMP.

General Requirements

A+ Reviewed and Certified by a Registered Professional Engineer

Name of PE: _____ Reg #: _____ State: _____ Date: _____

A+ Amendments, if any, reviewed and certified by PE. If different from above:

Name of PE: Michael R. Dusenbury Reg #: 15630 State: Colorado Date: 3-30-93

A+ Management approval

NA Measures called for in Plan, but not yet operational, discussed and explained

NA Spills prior to 1-10-74: description of spills and actions taken

I− Spill prediction for each type of major failure Lacks spill rate, direction of flow.

A+ Containment and/or diversionary structures/equipment discussed

NA Containment or alternatives impracticable: impracticability demonstrated; provision of 1) contingency plan, and 2) commitment of manpower, equipment and materials

O Plan reviewed and evaluated at three-year intervals to include more effective spill prevention and control/technology if feasible.

O Facility design, construction, operation or maintenance changed, affecting spill potential: Plan amended or will be within 6 months of changes. Date of changes: Dec, '93

Reviewer Comments: Two oil storage tanks (#19, 20) are being converted to wastewater storage/treatment tanks. A new tank for oil storage is being installed elsewhere on the facility. These changes will necessitate an amendment to the Plan within 6 months of completion of these changes. The new crude oil unloading area is not yet described in the Plan.

Specific Requirements

Facility Drainage - Diked Areas:

NA Stormwater drains, if present, are manual, open-and-closed design

NA Diked area stormwater flows unrestricted into drainage system, or effluent treatment system: system designed to handle oil

NA Diked areas are emptied by manually-activated pumps or ejectors: water examined for oil prior to starting

NA Diked areas are drained directly into a storm drain, or open water course, lake or pond, by-passing in-plant treatment: drainage valve or treatment by-pass valve normally sealed closed; water inspected to insure compliance with applicable water quality standards and to prevent a harmful discharge per 40 CFR Part 110; valve opened and resealed under responsible supervision; adequate records kept

I Stormwater removed by vacuum truck: water and any included oil disposed of properly

Reviewer Comments: No diked-area drains by-pass in-plant treatment. Discussion of removal of rainwater from diked areas is minimal and disposition of water removed is omitted (ie API separator, Should include process flow diagram for wastewater treatment ponds, etc.)

Facility Drainage-Undiked Areas: with discussion in Plan.

O Plant drainage system, including stormwater runoff from undiked areas, flows into a pond, lagoon or catchment basin: basin designed to retain oil or return it to the facility No discussion of stormwater ponds used south of the south tank farm. Ponds do not appear on the facility diagram (plot layout)

O Catchment basin, if used, not subject to periodic flooding

NA Plant drainage does not flow into pond, lagoon or catchment basin: diversion system designed to return a spill to facility

NA Plant drainage waters are treated in more than one treatment unit: natural gravity flow utilized

A A Transfer pumps are needed for water treatment: backup pumps provided

A A Plant drainage water treated in continuous process utilizing pump(s) for transfer: at least one permanently installed pump at each transfer station

O System used to handle drainage water engineered so that oil cannot reach navigable waters in event of equipment failure or human error

A I ~~O~~ Effluents: Disposal system discharges facility effluents into navigable waters; system observed frequently to detect system upset that could result in a discharge of oil.

Reviewer Comments: No discussion of stormwater system; ~~no discussion of monitoring of discharge to bedrock~~; no discussion of failsafe provisions of undiked area water handling system.

Bulk Storage Tanks:

A I Materials and construction methods for oil storage tanks compatible with oil stored and the conditions of storage minimal information provided "welded steel plate"

A A Bulk storage tanks provided with secondary means of containment sufficient to hold entire capacity of tank (or largest single tank) plus freeboard for precipitation

O Diked areas sufficiently impervious to retain spilled oil

NA Trenches used for secondary containment: spill equal to capacity of tank (or largest single tank) safely contained

NA Buried or partly buried tanks protected form corrosion no buried tanks

NA Buried Tanks regularly pressure tested Frequency: NA

I Aboveground tanks subject to periodic integrity testing appropriate to tank design Frequency: Periodic

I Comparison records of integrity testing maintained for individual tanks when appropriate

I Tank supports and foundations inspected

A A Tanks visually inspected at frequent intervals by operating personnel for deterioration, or leaks; leaks sufficient to cause accumulation of oil in diked areas promptly corrected ~~leaks, or accumulations of oil in diked areas~~

NA Steam returns or exhaust lines from internal heating coils discharge into open water course: monitored for contamination, or passed through system to remove or retain any oil No internal heating coils

A O Tanks fail-safe engineered to avoid over-filling No discussion.

A O Visible oil leaks from tank seams, gaskets, rivets or bolts, large enough to cause oil to accumulate in diked areas promptly corrected

O Mobile or portable oil tanks provided with secondary means of containment, or located to prevent spilled oil from reaching navigable waters

O Locations of portable or mobile tanks not subject to periodic flooding or washout

Reviewer Comments: Several omissions: dike impermeability; fail-safe eng. of tanks to prevent overflow; visible oil leaks... promptly corrected; mobile tanks. Inadequate discussion of tanks material-construction standards; tank integrity testing; comparison records; supports & foundations.

Facility Transfer Operations:

I — Buried piping protectively wrapped and coated; cathodically protected if conditions warrant need a statement explaining why cathodic protection is "NA"

A — Buried piping examined for deterioration whenever exposed; corrective action taken as appropriate

A — Aboveground pipe galleries or corridors used whenever possible

A — Out of service piping or piping on extended standby capped or blank-flanged; pipe marked as to origin

A A — Pipe supports designed to minimize abrasion and corrosion; allow for expansion and contraction

A A — General condition of aboveground valves, joints, catchpans, pipes and supports, metal surfaces, etc., regularly assessed by operating personnel

A — Periodic pressure testing done for piping in areas where facility drainage such that failure could result in spill to navigable water

A — Vehicular traffic granted entry visually or verbally warned to prevent damage to exposed piping

Reviewer Comments: ___

Facility Tank Railcar and Tank-Truck Loading/Unloading Racks

A — Loading/unloading procedures meet minimum requirements and regulations of DOT

I — Rack area drainage flows into catchment basin or treatment facility designed to handle oil Railcar area loading not discussed.

O NA — Quick-drain system used for tank-truck loading/unloading areas as alternative to above new Crude oil unloading rack.

I — Containment system will hold at least the largest single compartment of any tank-car or tank-truck loaded or unloaded at the facility

Does not discuss railcar loading area; new crude-oil unloading facility should be included at next SPCC Plan amendment.

I System in place to prevent vehicle departure before complete disconnect of transfer lines

A Prior to filling and before departure lowermost drains and other outlets of tanks cars or tank-trucks examined for leakage; if necessary, tightened, adjusted or replaced

Reviewer Comments: The measures for spill control called for in the Plan have not been implemented in the railcar loading area. The new crude oil unloading rack is not described yet in the SPCC Plan.

Inspections and Records:

O Written procedures for all required inspections developed for the facility Tanks, transfer piping, associated equipment-not discussed - Proc. not with Plan, loc.

I Industry standards for specific inspection procedures adopted; procedures reproduced in Plan or specifically referenced by name or number not referenced. API procedures followed for process equipment. Tanks, etc. not covered by this statement.

O Written inspection procedures included with the Plan or referenced as above

O Records of required inspections, signed by appropriate supervisor or inspector, maintained with Plan pipe pressure testing records only referenced in Plan

O Inspection records maintained for required time period

Reviewer Comments:

Security:

A A Facility fully fenced

A Entrance gates locked and/or guarded when facility not in production or is unattended

A Tank valves which could permit flow of tank contents to the ground securely locked closed when tank not in active use or standby status

A Loading or unloading connections of oil pipelines capped or blank-flanged when not in service or standby status for extended time

A Starter control on all oil pumps locked off or accessible only to authorized personnel when pumps in non-operating or non-standby status

I Lighting adequate for discovery of spills at night by operational personnel, or if not present, by general public, police, etc., and for prevention of spills due to vandalism minimal discussion - "light is adequate"

Reviewer Comments: Lighting for each major area where oil is stored should be described and its effectiveness relative to the regulatory goal attested to.

Personnel, Training, and Spill Prevention Procedures:

A Facility personnel properly instructed in operation and maintenance of equipment to prevent discharges of oil

I Facility personnel properly instructed in applicable pollution control laws, rules and regulations The SPCC Plan response to this requirement is "NA". An explanation is needed.

A Person designated who is accountable for oil spill prevention; reports to line management

I Spill prevention briefings conducted for operating personnel Not adequately addressed.

I Spill prevention briefings conducted at intervals frequent enough to assure adequate understanding of facility SPCC Plan not adequately addressed. Interval: _____

O Spill prevention briefings highlight and describe known spill events or failures, malfunctioning components, and newly developed precautionary measures

~~XX~~ Reviewer Comments: This section of the regulation is essentially disregarded in the SPCC Plan as being accomplished by "on-the-job training".

(b) (6) [redacted]

Reviewer Signature

SUMMARY EVALUATION OF SPCC PLAN FOR

Colorado Refining Company

This is an inadequate SPCC Plan and a particularly unfortunate format for a facility of this complexity (API format Plan).

The principal deficiencies are excessive brevity and absence of complete discussions of facility conformance to the guidelines; and omissions of required information.

Facility: Colorado Refining Company **Inspection Date:** December 2, 1993

Gas-Oil Tank Farm Containment Wall

Photographer: B. Litchford

Facility: Colorado Refining Company **Inspection Date:** December 2, 1993

South Tank Farm

Photographer: B. Litchford

Facility: Colorado Refining Company **Inspection Date:** December 2, 1993

Stormwater Pond

Photographer: B. Litchford

Facility: Colorado Refining Company **Inspection Date:** December 2, 1993

Aeration Pond Behind, Settling Pond in Foreground

Photographer: B. Litchford

Facility: Colorado Refining Company **Inspection Date:** December 2, 1993

South Tank Farm

Photographer: B. Litchford

Facility: Colorado Refining Company **Inspection Date:** December 2, 1993

South Tank Farm

Photographer: B. Litchford

Facility: Colorado Refining Company **Inspection Date:** December 2, 1993

Railcar Loading Area - Residual Oil Rack

Photographer: B. Litchford

Leaking Pipes, Pumps, Valves next to Tank #43

Photographer: R. Munn

Facility: Colorado Refining Company **Inspection Date:** December 2, 1993

Leaking Piping and Valves - Tank #32

Photographer: R. Munn

Facility: Colorado Refining Company **Inspection Date:** December 2, 1993

Pooled Oil From Sample Port Operation

Photographer: R. Munn

Facility: Colorado Refining Company **Inspection Date:** December 2, 1993

Railcar Loading Area - Diesel Rack

Photographer: B. Litchford

Facility: Colorado Refining Company **Inspection Date:** December 2, 1993

Railcar Loading Area

Photographer: B. Litchford

Facility: Colorado Refining Company **Inspection Date:** December 2, 1993

Crude Oil Truck Unloading Rack Inside Refinery

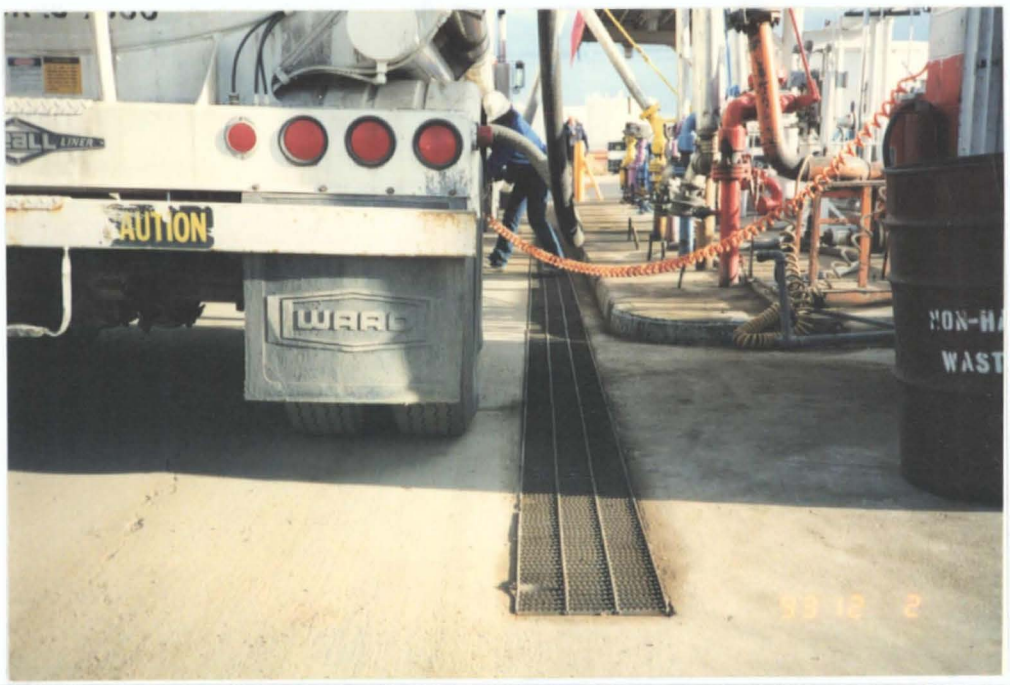
Photographer: B. Litchford

Facility: Colorado Refining Company **Inspection Date:** December 2, 1993

New Crude Oil Unloading Rack

Photographer: B. Litchford

Facility: Colorado Refining Company **Inspection Date:** December 2, 1993



Gasoline Loading Rack

Photographer: B. Litchford

Facility: Colorado Refining Company **Inspection Date:** December 2, 1993

Gasoline Loading Rack

Photographer: B. Litchford

Facility: Colorado Refining Company **Inspection Date:** December 2, 1993

Gasoline Loading Rack

Photographer: B. Litchford